EXHIBIT 5

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW MEXICO

INNOVATION LAW LAB,

Plaintiff,

v.

Civ. No. 2:22-cv-00443-SMV-KRS

U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT,

Defendant.

DECLARATION OF REBECCA SHEFF

- I, Rebecca Sheff, declare as follows:
- 1. I am a senior staff attorney with the American Civil Liberties Union of New Mexico. I have personal knowledge of all facts stated in this declaration.
- 2. Exhibit 2 is a report that I personally viewed and downloaded from the Department of Homeland Security Office of Inspector General website on or about June 10, 2022. The report is located at the following URL: https://www.oig.dhs.gov/sites/default/files/assets/2022-05/OIG-22-31-Mar22-mgmtalert.pdf. This printout is a fair and accurate copy of the content as it existed on June 10, 2022. This website is a government website run and operated by the Department of Homeland Security Office of Inspector General.
- 3. Exhibit 3 is a report that I personally viewed and downloaded from the U.S. Immigration and Customs Enforcement website on or about June 10, 2022. The report is located at the following URL: https://www.ice.gov/doclib/facilityInspections/torranceCoDetFac CL 03-31-2022.pdf. This printout is a fair and accurate copy of the content as it existed on June 10,

2022. This website is a government website run and operated by U.S. Immigration and Customs Enforcement.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

EXECUTED this 12th day of June, 2022 in Santa Fe, New Mexico.

Rebecca Sheff

New Mexico Bar No. 159065

ACLU OF NEW MEXICO

P.O. Box 566

Albuquerque, NM 87103

T: (505) 266-5915 F: (505) 266-5916 rsheff@aclu-nm.org